

**OTSUKA PHARMACEUTICAL CO. v. SANDOZ, INC. et al.**  
**Civil Action No. 3:07-CV-01000**

**PLAINTIFF'S DESIGNATIONS, DEFENDANTS' COUNTERDESIGNATIONS, PLAINTIFF'S COUNTERCOUNTERDESIGNATIONS, AND OBJECTIONS  
 RELATING THERETO**

Witness	Plaintiff's Designations (page line)	Defendants' Objections to Designations	Defendants' Counter-Designations	Defendants' Objections to Defendants' Counter-Designations*	Otsuka's Counter-Counter-Designations	Otsuka's Counter-Counter-Designations	Defendants' Objections to Counter-Counter-Designations
Bauer, J.	163:4-165:5	F (163:14-22); HE; REL; PCW	29:17-30:23, 37:18-38:6	R, V	39:25-40:19	HE; REL; PCW	
Bauer, J.					91:2-17	HE; REL; PCW	
Dolitzky, B.-Z.	169:12-176:13	F (169:18-19, 172:6-7, 172:15-16, 173:4-6, 173:13-14, 173:21-22, 174:11-12); HE; REL; PCW	169:18-19, 170:13-17, 170:21, 171:3, 172:6-7, 172:15-16, 173:4-6, 173:13-14, 173:21-22, 174:11-12); HE; REL; PCW	20:3-21:1	HE; REL; PCW		
Dolitzky, B.-Z.	178:5-179:10	F (179:1-3); HE; REL; PCW	179:1-3		21:4-6	HE; REL; PCW	

F = Form (FRCP 32(d)(3))  
 REL = Relevance (FRE 401/402)  
 PCW = Prejudice, Confusion, or Waste of Time (FRE 403)  
 PK = Lack of Personal Knowledge (FRE 602)  
 HE = Hearsay (FRE 802)  
 30(b)(6) = Outside the Scope of 30(b)(6) Notice  
 Not 30(b)(6) = Outside the Scope of Personal Knowledge

\*Objections are indicated by the letter codes set forth in the letter from P. Browning dated April 30, 2010 to Defendants' counsel

Witness	Plaintiff's Designations (page:line)	Defendants' Objections to Designations	Defendants' Counter-Designations	Defendants' Objections to Defendants' Counter-Designations*	Otsuka's Counter-Counter-Designations	Otsuka's Counter-Counter-Designations	Defendants' Objections to Counter-Counter-Counter-Designations
Dolitzky, B.-Z.	196:6-197:11	HE; REL; PCW			22:8-13		HE; REL; PCW
Dolitzky, B.-Z.	207:14-211:18	F(208:4-5, 208:15-16, 209:11-12, 210:5-6, 210:14-15, 211:6, 211:13- 14); HE; REL; PCW	208:4-5, 208:15-16, 209:11-12, 210:5-6, 210:14-15, 211:6, 211:13-14				
Dolitzky, B.-Z.	221:3-21	HE; REL; PCW	221:22- 222:2	R,V			
Dolitzky, B.-Z.	222:3-13	F(222:7-8); HE; REL; PCW	222:7-8, 222:14- 223:1	R,V			
Dolitzky, B.-Z.	223:4-7	F(223:9-10); HE; REL; PCW	223:2-3, 223:8-19	R,V			
Dolitzky, B.-Z.	223:20-224:10	HE; REL; PCW					
Dolitzky, B.-Z.	236:6-237:1	HE; REL; PCW					
Dolitzky, B.-Z.	237:3-19	HE; REL; PCW					
Dolitzky, B.-Z.	237:21-238:17	HE; REL; PCW					

Witness	Plaintiff's Designations (page:line)	Defendants' Objections to Designations	Defendants' Counter-Designations	Otsuka's Objections to Defendants' Counter-Designations*	Otsuka's Counter-Counter-Designations	Defendants' Objections to Counter-Counter-Counter-Designations
Dufresne, D.	167:16-168:25	HE; REL; PCW			39:8-21	HE; REL; PCW
Dufresne, D.	173:13-176:15	F (174:8-17, 175:5-9, 175:11-16, 175:18-22, 176:6-10); HE; REL; PCW	176:16-177:1, 177:12-178:7, 178:17-179:4	R,V	130:4-131:1	HE; REL; PCW
Dufresne, D.	204:24-205:5	HE; REL; PCW				
Dufresne, D.	219:15-223:8	F (221:25-122:12, 222:13-20, 222:25-223:8); HE; REL; PCW	118:5-119:22, 219:24-220:2, 222:22-223:17	R,V	141:7-142:11	HE; REL; PCW
Dufresne, D.	244:8-245:24	F (244:25-245:1); HE; REL; PCW	248:10-250:10, 250:17-251:20	R,V	178:9-11	HE; REL; PCW
Dufresne, D.	259:21-260:8	HE; REL; PCW	255:7-16, 258:21-259:8, 262:13-263:19	R,V	179:6-24	HE; REL; PCW

Witness	Plaintiff's Designations (page:line)	Defendants' Objections to Designations	Defendants' Counter-Designations	Defendants' Objections to Defendants' Counter-Designations*	Otsuka's Counter-Counter-Designations	Otsuka's Counter-Counter-Designations	Defendants' Objections to Counter-Counter-Designations
Ganorkar, K.	17:7-18:5	HE; REL; PCW	18:6-8			12:21-14:2	HE; REL; PCW
Ganorkar, K.	18:9-19	HE; REL; PCW			25:3-8		HE; REL; PCW
Ganorkar, K.	28:9-14	HE; REL; PCW; PK	28:15-18, 29:1-4	R	28:19-22		HE; REL; PCW
Ganorkar, K.	29:5-10	HE; REL; PCW			36:6-13		HE; REL; PCW
Ganorkar, K.	35:6-13	HE; REL; PCW; PK			39:18-40:4		HE; REL; PCW
Ganorkar, K.	37:18-38:7	HE; REL; PCW			64:2-7		HE; REL; PCW
Ganorkar, K.	51:10-20	HE; REL; PCW					
Ganorkar, K.	71:14-72:16	HE; REL; PCW					
Ganorkar, K.	74:12-75:5	F (74:15-18); HE; REL; PCW; PK	74:15-18				
Ganorkar, K.	87:9-89:14	HE; REL; PCW; PK					
Ganorkar, K.	103:19-104:4	HE; REL; PCW					
Ganorkar, K.	177:1-20	HE; REL; PCW					

Witness	Plaintiff's Designations (page:line)	Defendants' Objections to Designations	Defendants' Counter-Designations	Otsuka's Objections to Defendants' Counter-Designations*	Otsuka's Counter-Counter-Designations	Defendants' Objections to Counter-Counter-Designations
Ganorkar, K.	179:7-180:10	F (180:1-4); HE; REL; PCW	180:1-4, 180:11-181:4	R		
Ganorkar, K.	181:5-182:1	F (181:8-9, 181:21-22); HE; REL; PCW	181:8-9, 181:21-22			
Gioia, P.	169:19-172:17	30(b)(6) (159:11-160:3); HE; REL; PCW; PK	159:11-160:3, 194:13-17	R,Ar	21:1-22:4	HE; REL; PCW
Gioia, P.	228:11-229:3	30(b)(6) (159:11-160:3); HE; REL; PCW	159:11-160:3	R,Ar	34:6-19	HE; REL; PCW
Gioia, P.	267:16-268:9	30(b)(6) (159:11-160:3); HE; REL; PCW	159:11-160:3	R,Ar	36:4-17	HE; REL; PCW
Gioia, P.	318:12-319:6	30(b)(6) (159:11-160:3); HE; REL; PCW	159:11-160:3	R,Ar	71:8-11	HE; REL; PCW
Gioia, P.					71:16-72:5	HE; REL; PCW
Hrakovskiy, J.	222:19-223:21	30(b)(6) (98:8-99:8); HE; REL;	98:8-99:8	R,Ar	49:4-16	HE; REL; PCW

Witness	Plaintiff's Designations (page line)	Defendants' Objections to Designations	Defendants' Counter-Designations	Defendants' Objections to Defendants' Counter-Designations*	Otsuka's Counter-Counter-Designations	Otsuka's Counter-Counter-Designations	Defendants' Objections to Counter-Counter-Designations
		PCW					
Hrakovský, J.	231:3-18	30(b)(6) (98:8-99:8); HE; REL; PCW		98:8-99:8	R,Ar		
Hrakovský, J.	233:4-19	30(b)(6) (98:8-99:8); HE; REL; PCW		99:8-99:8	R,Ar		
Hrakovský, J.	234:12-235:3	30(b)(6) (98:8-99:8); HE; REL; PCW		98:8-99:8	R,Ar		
Hrakovský, J.	242:2-16	30(b)(6) (98:8-99:8); HE; REL; PCW		98:8-99:8	R,Ar		
Hrakovský, J.	243:9-244:5	30(b)(6) (98:8-99:8); HE; REL; PCW		98:8-99:8, 244:6-7	R,Ar		
Hrakovský, J.	244:15-245:10	30(b)(6) (98:8-99:8); HE; REL; PCW		98:8-99:8, 245:11-246:8	R,Ar		
Hrakovský, J.	246:11-247:22	30(b)(6) (98:8-99:8); HE; REL;		98:8-99:8	R,Ar		

Witness	Plaintiff's Designations (page:line)	Defendants' Objections to Designations	Defendants' Counter-Designations	Defendants' Counter-Designations*	Otsuka's Counter-Counter-Designations	Otsuka's Counter-Counter-Designations	Defendants' Objections to Counter-Counter-Designations
		PCW					
Krishnan, K.	217:7-20	HE; REL	218:21-219:1	R	24:13-19	HE; REL; PCW	
Krishnan, K.					217:21-218:8	HE; REL; PCW	
Krishnan, K.					219:2-4	HE; REL; PCW	
Lucas, C.	60:4-61:10	F (60:17-20, 60:22-61:5, 61:7-10); HE; REL; PCW	59:7-60:3, 60:17-60:20, 63:7-15	R,V	12:1-15	HE; REL; PCW	
Lucas, C.	63:20-65:6	F (63:20-64:1, 64:3-10, 64:14-21); HE; REL; PCW	62:14-22, 63:7-15, 64:3-10, 65:1-21	R	32:13-33:2	HE; REL; PCW	
Lucas, C.	74:10-75:15	F (74:10-13, 74:15-19, 75:6-15); HE; REL; PCW	73:10-74:13, 75:17-76:4	R			
Lucas, C.	76:6-77:7	F (76:19-77:3); HE; REL; PCW	76:6-11				
Lucas, C.	201:14-202:2	HE; REL; PCW					

Witness	Plaintiff's Designations (page:line)	Defendants' Objections to Designations	Defendants' Counter-Designations	Defendants' Objections to Defendants' Counter-Designations*	Otsuka's Counter-Counter-Designations	Otsuka's Counter-Counter-Designations	Defendants' Objections to Counter-Counter-Counter-Designations
McIntire, T.	88.5-89:8	HE; REL; PCW	80:7-9, 80:13-18, 92:21-93:3, 119:6-8, 119:12, 120:19-22, 121:8-11, 121:21- 122:20, 125:7-8, 125:12	R,V	16:1-17:9	HE; REL; PCW	
McIntire, T.	147:15-148:21	HE; REL; PCW	56:15-57:5, 167:15-17, 167:20- 168:4, 168:7-13, 173:18 – 174:16, 175:13-22, 176:4-5, 176:7-12	R,V	51:8-52:2	HE; REL; PCW	
McIntire, T.	262:9-263:2	HE; REL; PCW			97:4-11	HE; REL; PCW	
McIntire, T.	264:5-22	HE; REL; PCW; PK	91:17, 91:22-93:2	R,V	103:13-19	HE; REL; PCW	

Witness	Plaintiff's Designations (page:line)	Defendants' Objections to Designations	Defendants' Counter-Designations	Defendants' Counter-Designations*	Otsuka's Objections to Defendants' Counter-Counter-Designations*	Otsuka's Counter-Counter-Designations	Defendants' Objections to Counter-Counter-Counter-Designations
McIntire, T.	283:15-284:4	HE; REL; PCW	80:7-9, 80:13-18, 91:17, 91:22-93:2	R,V	110:12-20	HE; REL; PCW	
McIntire, T.	287:15-288:10	HE; REL; PCW	80:7-9, 80:13-18 91:17, 92:22-93:2, 119:6-8, 119:12-17, 120:19-22, 121:8-11, 121:21- 122:20, 125:7-8, 125:12	R,V			
Muthal, A.	144:19-146:13	HE; REL; PCW			8:10-9:20	HE; REL; PCW	
Muthal, A.					11:2-7	HE; REL; PCW	
Muthal, A.					12:14-22	HE; REL; PCW	
Muthal, A.					13:6-14:22	HE; REL; PCW	
Muthal, A.					44:14-17	HE; REL; PCW	

Witness	Plaintiff's Designations (page:line)	Defendants' Objections to Designations	Defendants' Counter-Designations	Defendants' Objections to Defendants' Counter-Designations*	Otsuka's Counter-Counter-Designations	Otsuka's Counter-Counter-Designations	Defendants' Objections to Counter-Counter-Counter-Designations
Muthal, A.					52:13-20	HE; REL; PCW	
Payne, A.	133:8-20	30(b)(6) (136-2-5); HE; REL; PCW	135:18-136:9	R	21:20-22:9	HE; REL; PCW	
Payne, A.	137:19-140:18	30(b)(6) (136-2-5); F (138:9, 139:13, 140:14-15); HE; REL; PCW	135:18-136:9, 138:9, 139:13, 140:14-15	R	25:17-21	HE; REL; PCW	
Payne, A.						26:11-15	HE; REL; PCW
Payne, A.						27:3-12	HE; REL; PCW
Payne, A.						37:2-16	HE; REL; PCW
Ramaswami, B.	55:21-56:4	F (55:21-56:4); HE; REL; PCW	55:8-13, 55:17-20, 56:5-18, 62:13-16	R,AA	17:4-20	HE; REL; PCW	
Ramaswami, B.	206:16-207:18	HE; REL; PCW	115:22-116:3, 207:19-208:5	R			
Ramaswami, B.	220:8-222:3	F (221:7-12, 221:21-222:3);	111:11-112:7,	R			

Witness	Plaintiff's Designations (page:line)	Defendants' Objections to Designations	Defendants' Counter-Designations	Defendants' Objections to Defendants' Counter-Counter-Designations*	Otsuka's Counter-Counter-Designations	Otsuka's Counter-Counter-Designations	Defendants' Objections to Counter-Counter-Counter-Designations
			HE; REL; PCW	209:15- 210:9, 210:15- 211:1, 221:7-12			
Shanghvi, D.	9:10-19	F(9:12-15); HE; REL; PCW		9:12-15		4:16-19	HE; REL; PCW
Shanghvi, D.	19:14-20:2	F(19:20-21); HE; REL; PCW		19:20-21			
Shanghvi, D.	24:15-25:12	HE; REL; PCW					
Shanghvi, D.	30:10-13	HE; REL; PCW					
Shanghvi, D.	32:7-16	F(32:7-11); HE; REL; PCW		32:7-11			
Shanghvi, D.	40:5-8	HE; REL; PCW					
Shanghvi, D.	74:7-75:3	HE; REL; PCW					
Shanghvi, D.	81:3-8	HE; REL; PCW; PK					
Sherman, B.	30:8-31:5	HE; REL; PCW		18:9-19:10, 22:4-23:4, 24:10-25:4,	R,V,AA	7:16-21	HE; REL; PCW

Witness	Plaintiff's Designations (page:line)	Defendants' Objections to Designations	Defendants' Counter-Designations	Otsuka's Objections to Defendants' Counter-Counter-Designations*	Otsuka's Counter-Counter-Designations	Defendants' Objections to Counter-Counter-Counter-Designations
Sherman, B.	33:20-35:11	HE; REL; PCW	18:9-19:10, 22:4-23:4, 24:10-25:4, 32:3-8,	R,V,AA	41:5-42:6	HE; REL; PCW
Sherman, B.	36:21-37:10	HE; REL; PCW	18:9-19:10, 22:4-23:4,	R,V,AA	65:22-66:2	HE; REL; PCW

Witness	Plaintiff's Designations (page:line)	Defendants' Objections to Designations	Defendants' Counter-Designations	Otsuka's Objections to Defendants' Counter-Designations*	Otsuka's Counter-Counter-Designations	Otsuka's Counter-Counter-Designations	Defendants' Objections to Counter-Counter-Counter-Designations
				24:10-25:4, 32:3-8, 32:17-33:5, 35:10-22, 36:1-15, 58:17-59:9, 39:11-13, 39:21-41:4, 42:7-43:7, 58:17-59:9, 63:5-19, 64:3-65:21, 66:3-14, 67:1-2			
Sherman, B.	72:11-17	HE; REL					
Sherman, B.	74:6-75:3	F; HE; REL; PCW; PK		71:13-72:10 R,V			
Sherman, B.	98:12-99:2	HE; REL; PCW; PK		71:13-72:10 R,V			
Tao, B.	134:5-16	HE; REL				15:14-16:15 HE; REL; PCW	
Tao, B.	302:20-304:16	HE; REL; PCW		16:12-16:22		17:3-19 HE; REL; PCW	
Tao, B.	305:3-307:8	HE; REL;	38:19-21, R		38:22-39:1 HE; REL; PCW		

Witness	Plaintiff's Designations (page:line)	Defendants' Objections to Designations	Defendants' Counter-Designations	Otsuka's Objections to Defendants' Counter-Designations*	Otsuka's Counter-Counter-Designations	Defendants' Objections to Counter-Counter-Designations
Tao, B.	345:21-346:13	F; HE; REL; PCW; PK	21:6-14, 22:6-16, 22:17-23:7, 38:19-21, 39:2-9, 45:19-46:2 72:20-73:9, 73:11-13,	R	44:19-45:17	HE; REL; PCW
Upadhye, S.	59:2-17	HE; REL; PCW				
Veerababu, T.	118:20-119:15	F (119:12-14); HE; REL; PCW	119:12-14		49:9-16	HE; REL; PCW
Veerababu, T.	127:13-22	HE; REL; PCW				
Veerababu, T.	128:19-21	HE; REL; PCW				
Veerababu, T.	131:19-132:9	HE; REL; PCW	132:10- 132:2	R		
Veerababu, T.	133:3-6	HE; REL; PCW				
Veerababu, T.	197:7-14	HE; REL; PCW				
Velagapudi, R.	139:15-140:4	Not 30(b)(6) (79:16-80:2);	79:16-80:2	R	41:4-18	HE; REL; PCW

Witness	Plaintiff's Designations (page:line)	Defendants' Objections to Designations	Defendants' Counter-Designations	Defendants' Objections to Defendants' Counter-Designations*	Otsuka's Counter-Counter-Designations	Otsuka's Counter-Counter-Counter-Designations	Defendants' Objections to Counter-Counter-Counter-Designations
Velagapudi, R.	141:7-18	Not 30(b)(6) (79:16-80:2); HE; REL; PCW	79:16-80:2	R			